

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

*The County of Summit, Ohio, et al. v.
Purdue Pharma L.P., et al.*

Case No. 18-op-45090

and

*The County of Cuyahoga v. Purdue
Pharma L.P., et al.*

Case No. 1:18-op-45004

MDL No. 2804

Case No. 17-md-2804

Hon. Judge Dan A. Polster

DISCOUNT DRUG MART INC.'S WITNESS LIST

Pursuant to Federal Rule of Civil Procedure 26 and the Revised Track One-B Civil Jury Trial Order, ECF No. 3308, entered in *In re National Prescription Opiate Litigation* (MDL 2804) on May 29, 2020, Discount Drug Mart, Inc. hereby discloses the following witnesses who may testify at trial on its behalf. The inclusion of any name on the list below is not a statement by Discount Drug Mart that the named representative will in fact testify, or that the witness is available or subject to subpoena in this matter. Discount Drug Mart reserves the right to call any of these witnesses in its case in chief. In serving this witness list, Discount Drug Mart specifically reserves the right to amend, supplement, or otherwise modify these disclosures if

new or modified information is provided at any point. Discount Drug Mart further reserves the right to call any witnesses identified on any other party's witness list, including any party who later settles or is severed or dismissed. Discount Drug Mart also reserves the right to call any witnesses identified on any joint defense witness list. Discount Drug Mart reserves the right to conduct a direct examination of any witness called by the Plaintiffs. Discount Drug Mart also reserves the right to call witnesses to rebut the Plaintiffs' case, supplement and/or amend this witness list in response to rulings of the Court on pretrial motion, and supplement and/or amend this witness list in response to other new information. Discount Drug Mart reserve the right to supplement and/or amend this witness list as the result of ongoing depositions in this action. Discount Drug Mart further reserves the right to call by video additional witnesses not identified on this list that are submitted as part of current or future video designations.

Fact Witnesses

1. Jason Briscoe, Director, Pharmacy Operations, Discount Drug Mart, Inc.

Areas of Testimony: Mr. Briscoe may be called to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related his duties and responsibilities as Director, Pharmacy Operations, on matters related to his other previous relevant employment and experience, and/or related to his previous deposition testimony in this action.

2. Meredith A. Carter, Diversion Inspector, U.S. Department of Justice, Drug Enforcement Administration, Diversion Control Division, Cleveland, Ohio

Areas of Testimony: Ms. Carter may be called to testify concerning matters related to the claims and defenses in this action, including but not limited to

matters related to her current or former duties and responsibilities as a DEA Diversion Investigator and/or related to her previous relevant employment.

3. PJ Ferut¹, Retired; former Vice President, IT, Discount Drug Mart, Inc.

Areas of Testimony: Ms. Ferut may be called to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related his duties and responsibilities as Vice President, Information Technology, and on matters related to her other previous relevant employment and experience.

4. Tom McConnell, Vice President, Finance, Discount Drug Mart, Inc.

Areas of Testimony: Mr. McConnell may be called to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related his duties and responsibilities as Vice President, Finance, on matters related to his other previous relevant employment and experience, and/or related to his previous deposition testimony in this action.

5. Michelle A. Mitchell, Diversion Inspector, U.S. Department of Justice, Drug Enforcement Administration, Diversion Control Division, Cleveland, Ohio

Areas of Testimony: Ms. Mitchell may be called to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related to her current or former duties and responsibilities as a DEA Diversion Investigator and/or related to her previous relevant employment.

¹ PJ Ferut is no longer an employee of Discount Drug Mart and by listing her hereon, Discount Drug Mart is in no way guaranteeing her availability for trial.

6. Keith Miller, Vice President, Information Technology, Discount Drug Mart, Inc.

Areas of Testimony: Mr. Miller may be called to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related his duties and responsibilities as Vice President, Information Technology, on matters related to his other previous relevant employment and experience, and/or related to his previous deposition testimony in this action.

7. Tom Nameth², Retired; former Director, Pharmacy Operations, Discount Drug Mart, Inc.

Areas of Testimony: Mr. Nameth may be called to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related his duties and responsibilities as Director, Pharmacy Operations, from which he retired in 2014, on matters related to his other previous relevant employment and experience, and/or related to his previous deposition testimony in this action.

8. Peter Ratycz, Vice President, Pharmacy, Discount Drug Mart, Inc. (Retired)

Areas of Testimony: Mr. Ratycz may be called to testify concerning matters related to the claims and defenses in this action, including but not limited to matters related his duties and responsibilities as Vice President, Pharmacy, on matters related to his other previous relevant employment and experience, and/or related to his previous deposition testimony in this action.

² Tom Nameth is no longer an employee of Discount Drug Mart and by listing him hereon, Discount Drug Mart is in no way guaranteeing his availability for trial.

Dated: September 21, 2020

Respectfully submitted,

/s/ Timothy D. Johnson

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that the foregoing document was served via the Court's ECF system to all counsel of record on September 21, 2020.

/s/ Timothy D. Johnson

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